

# EXHIBIT 14

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA : 14 Cr. 68 (KBF)

- against - :

ROSS ULBRICHT, : DECLARATION  
OF MEGHAN RALSTON

Defendant. :

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MEGHAN RALSTON, pursuant to 28 U.S.C. §1746, hereby affirms under penalty of perjury:

1. I am the former harm reduction manager for the Drug Policy Alliance (hereinafter “DPA”), based in Los Angeles, California. I was employed full-time with DPA from October 2006 through May 15, 2015. My work included implementing over-the-counter pharmacy syringe sales throughout Los Angeles County; organizing the first major U.S. commemoration of International Overdose Awareness Day; and creating the first-ever Southern California Harm Reduction Summit. I have served as the point person on two DPA California harm reduction bills which were successfully signed into law (AB 1535; AB 472). I have also served as co-chair of both the Los Angeles Overdose Prevention Task Force and the Los Angeles Harm Reduction Collaborative. I currently work as a freelance policy consultant for Drug Policy Alliance. In 2015, I will be focusing on implementing California pharmacy access to the overdose reversal medicine naloxone.

2. In light of my expertise in the areas of the U.S. overdose crisis; prescription drugs; drug use; harm reduction issues and U.S. drug policy generally, my op-eds, quotes and interviews about effective ways to reduce the harms of U.S. drug policies, including the misuse of pharmaceutical and non-pharmaceutical drugs, have appeared in dozens of news outlets

including *AP*, *Reuters*, the *UK Daily Mail*, the *Los Angeles Times*, *USA Today*, *Newsweek*, the *San Francisco Chronicle*, the *Orange County Register*, *Newsday*, the *Houston Chronicle*, the *Huffington Post* and on Time.com. My television appearances on the same subjects include Al Jazeera, RT America, HuffPost Live and Fox. I have been interviewed and featured in the *New York Times* best-selling book “Chasing the Scream” by Johann Hari as a leading expert on the prescription drug crisis. I have also appeared in the documentary film, “After EDC,” which chronicles the aftermath of a suspected ecstasy-related death at a rave in Los Angeles. Additionally, I have presented on a variety of harm reduction topics at numerous conferences across the country and internationally.

3. I graduated *summa cum laude* from Capital University in Columbus, Ohio, and my research on relationship management has appeared in a variety of academic publications. Prior to joining DPA, I created and ran Street Medicine, a volunteer-driven project to assemble and distribute first aid kits to homeless populations throughout Los Angeles County.

4. As a result of my work with the DPA, and in the areas of harm reduction and reduction of drug-related violence, I have become familiar with the Silk Road website. I have studied the site and have also published opinion editorials on the topic of Silk Road, in particular, including:

- *The End of the Silk Road: Will Shutting Down the ‘e-Bay for Drugs’ Cause More Harm Than Good?* October 3, 2013 [http://www.huffingtonpost.com/meghan-ralston/silk-road-shut-down\\_b\\_4038280.html](http://www.huffingtonpost.com/meghan-ralston/silk-road-shut-down_b_4038280.html), attached as Exhibit 9 to the Declaration of Lindsay A. Lewis, Esq.; and,
- *Silk Road Was a Better, Safer Way to Buy and Sell Drugs* February 12, 2015 <http://www.alternet.org/drugs/silk-road-better-safer-way-buy-sell-drugs>, attached as Exhibit 10 to the Declaration of Lindsay A. Lewis, Esq.

5. Accordingly, through my analysis of the Silk Road website, and my work with the DPA in the area of harm reduction, and as set forth in the above-mentioned pieces, I have reached the following conclusions – all of which represent my personal beliefs; none of which necessarily represent the views or official positions of my employer, the DPA:

- a. at the outset, we must acknowledge the current state of drug use and the drug trade in the United States and abroad. People use drugs. They get those drugs from someone else. In order to consume drugs, someone had to buy them, and someone had to sell them. Well-established research has also demonstrated links between violence and the illicit drug trade, in a variety of settings, including urban settings. We don't have to like it, but we do have to accept the reality of it;
- b. our entire approach to responding to that reality has thus far been a dismal disappointment. Silk Road was, in the most basic sense, a product of our failed war on drugs—a response to our woefully inadequate way of managing not only drug use, but also drug demand and drug sales;
- c. operating as an above-ground source for a variety of drugs, ranging from marijuana to heroin and virtually everything in between, Silk Road created a safe environment, free of weapons and violence during the transaction, where people could acquire drugs. Many reformers, myself included, have long been highlighting the forward-thinking benefits of Silk Road and the ways it began to slowly revolutionize drug sales around the world. For instance, it provided a platform that could allow indigenous growers and cultivators around the world to sell directly to the consumer, potentially reducing cartel participation and violence;

- d. accordingly, using Silk Road could be seen as a more responsible approach to drug sales, a peaceable alterative to the often deadly violence so commonly associated with the global drug war, and street drug transactions, in particular. None of the transactions on Silk Road, for instance, resulted in women drug buyers being sexually assaulted or forced to trade sex for drugs, as remains a possibility in some street-level drug transactions. Nor did any Silk Road transactions result in anyone having a gun pulled on them at the moment of purchase, also a danger present in face-to-face street-level drug transactions;
- e. moreover, even with all the hurdles and the risks, people chose to use Silk Road rather than rely exclusively on whatever illegal and potentially dangerous drug market existed in their 'real world' community. Given the choice of quickly and easily accessing drugs in potentially sketchy or dangerous neighborhoods, or buying them safely on-line but having to wait, many users preferred privacy, security and a wait to the alternative;
- f. thus, the shutdown of Silk Road, intended to curtail organized drug use and sales, will not accomplish that goal. Silk Road is not the only website of its kind and its displaced users will likely either turn to a competitor site or seek out drugs in other ways. This approach to fighting the war on drugs has never worked and it's not likely to start working now.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. 28 U.S.C. §1746. Executed May 14, 2015.



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MEGHAN RALSTON